<u>REMARKS</u>

The preamble of Claim 10 has been amended as
suggested by the examiner to overcome the rejections under 35
U.S.C. § 101 and 112.

Claims 1-3, 6, 10-12, and 15 have been amended as
suggested by the examiner to satisfy the objections and to
overcome the rejection under 35 U.S.C. § 103. Support for the
amendment may be found in the specification in FIG. 3 and on
page 10, lines 1-15.

Claims 1-18 are pending in the application.

By way of this response, Applicant has made a
diligent effort to place the claims in condition for
allowance. However, should there remain any outstanding
issues that require adverse action, it is respectfully
requested that the examiner telephone Timothy R. Croll at
(408)433-7625 so that such issues may be resolved as
expeditiously as possible.

<u>Response to the rejection under 35 U.S.C. § 103</u>

Claims 1-18 stand rejected under 35 U.S.C. § 103(a)
as being unpatentable over Beausang, U.S. Patent No. 5,828,579
(*Beausang*) in view of Nadeau-Dostie et al., U.S. Patent No.
6,457,161 (*Nadeau*). Applicant respectfully traverses the
rejection as follows.

Regarding Claims 1 and 10, the rejection compares
the claimed step of initializing a corresponding list of cells
for each common signal domain recited in Claims 1 and 10 with
constructing scan chains in *Beausang*. Even if constructing a
scan chain were equivalent to initializing a corresponding
list of cells for each common signal domain as alleged by the
rejection, the scan chains in *Beausang* cited by the rejection

necessarily comprise cells. In contrast to *Beausang*, the
claimed corresponding list of cells is initialized as an empty
list. Because the scan chains in *Beausang* cited by the
rejection are not empty scan chains, *Beausang* does not teach
or suggest the claimed initialized corresponding list of cells
for each common signal domain in which each corresponding list
of cells is created as an empty list. Because *Beausang* does
not teach or suggest the claimed corresponding list of cells
for each common signal domain, the modification of *Beausang* by
Nadeau proposed by the rejection fails to arrive at the
claimed invention.

        Further, because *Beausang* does teach or suggest the
claimed corresponding list of cells, *Beausang* does not teach
or suggest selecting a cell belonging to one of the common
signal domains that is not included in a corresponding list of
cells for any of the common signal domains. Because *Beausang*
does not teach or suggest selecting a cell belonging to one of
the common signal domains that is not included in a
corresponding list of cells for any of the common signal
domains, the modification of *Beausang* by *Nadeau* proposed by
the rejection fails to arrive at the claimed invention.

        Still further, because *Beausang* does teach or
suggest the claimed corresponding list of cells, *Beausang* does
not teach or suggest inserting the selected cell in the
corresponding list of cells for the common signal domain
associated with the signal driver. Because *Beausang* does not
teach or suggest inserting the selected cell in the
corresponding list of cells for the common signal domain
associated with the signal driver, the modification of
Beausang by *Nadeau* proposed by the rejection fails to arrive
at the claimed invention.

        Because the modification of *Beausang* by *Nadeau*

proposed by the rejection fails to arrive at the claimed
invention, Claims 1 and 10 are not obvious under 35 U.S.C. §
103.

The rejection of Claims 2-9 and 11-18 is traversed
for the same reasons presented in defense of Claims 1 and 10.

In view of the above, Applicant respectfully
requests favorable examination and reconsideration of Claims
1-18.

No additional fee is believed due for this
amendment.

Respectfully submitted,

/ Eric James Whitesell /

Eric James Whitesell #38657

Address all correspondence to:

LSI Logic Corporation

1621 Barber Lane, M/S D-106

Milpitas, CA 95035-7458

Direct telephone inquiries to:

Timothy R. Croll

(408) 433-7625